

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**VICTORIA L. FRAZIER,**

**Plaintiff,**

**vs.**

**EXPERIAN INFORMATION  
SOLUTIONS, INC, TRANS UNION  
LLC, AND LITTON LOAN  
SERVICING, L.P.,**

**Defendants.**

**CIVIL DOCKET NO: 3:11cv497-JRS**

**LITTON LOAN SERVICING, LP'S  
DISCOVERY DESIGNATIONS**

Comes the named Defendant Litton Loan Servicing, LP ("Litton" or "Defendant"), without waiving its request for the Court to re-open and permit additional discovery [see Doc.53],<sup>1</sup> and submits its discovery designations required by Paragraph No. 14 of the Court's Scheduling and Jury PreTrial Order [Doc. 21]. Litton hereby designates the following:

1. "Plaintiff's Responses to Defendant Litton Loan Servicing, L.P.'s First Set of Requests for Admission," Numbers 1, 2 and 6-11.
2. "Declaration of Victoria L. Frazier," Paragraph Numbers 1-3, 10 (first sentence only), 12, 17, 19 and 21-23. *See* Doc. 29-1.
3. Plaintiff's Answers to Defendant Litton Loan Servicing, L.P.'s First Set of Interrogatories," Numbers 1-2 (Plaintiff's incorporation of Litton's transaction and comments logs only), 19 (first paragraph only), 20, 24, 26, and 28-29, except as otherwise objectionable to Litton.

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<sup>1</sup> If the Court re-opens and permits additional time for discovery, then Litton likewise requests that it be permitted to amend and/or supplement the designations herein.

4. Litton's Comments and Transactions Logs, which Plaintiff has incorporated into her verified discovery responses, except as otherwise objectionable to Litton.

5. Litton's Affidavits submitted in accordance with the Court's Order. *See* Doc. 54.

6. All documents, electronic information or other tangible things identified during discovery that are not otherwise objectionable to Litton.

Litton reserves the right to amend its Discovery Designations based on subsequent discovery of additional evidence, the results of pending or future discovery, for rebuttal purposes, the results of upcoming motions *in limine*, or other good cause. Litton also reserves the right to object to the introduction of any designations set forth herein or offered by Plaintiff, and expressly reserves all objections that it may be entitled to assert.

DATED this 26th day of March, 2012.

Respectfully submitted,

**LITTON LOAN SERVICING, LP**

/s/ Gary L. Edwards

Gary L. Edwards, Esq.

VA Bar No. 44848

Attorney for Litton Loan Servicing, LP

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 26, 2012, a copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

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\_\_\_\_/s/ Gary L. Edwards\_\_\_\_  
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